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U.S. District Court  
Middle District of TN

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
Nashville DIVISION

Antonius Carter

(Name)

# 213516

(Prison Id. No.)

(Name)

(Prison Id. No.)

Plaintiff(s)

v.

Mimi Lawrence

(Name)

Austin Boldie "et al."

(Name)

Defendant(s)

(List the names of all the plaintiffs filing  
this lawsuit. Do not use "et al." Attach  
additional sheets if necessary.)

03-22 0730

Civil Action No. \_\_\_\_\_  
(To be assigned by the Clerk's Office.  
Do not write in this space.)

JURY TRIAL REQUESTED ☒ YES ☐ NO

(List the names of all defendants  
against whom you are filing this  
lawsuit. Do you use "et al." Attach  
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS FILED  
PURSUANT TO 42 U.S.C. § 1983

I. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: \_\_\_\_\_  
Prison I.D. No. of the first plaintiff: \_\_\_\_\_  
Address of the first plaintiff: \_\_\_\_\_  
\_\_\_\_\_

Status of Plaintiff: CONVICTED ( ) PRETRIAL DETAINEE ( )

2. Name of the second plaintiff: \_\_\_\_\_  
Prison I.D. No. of the second plaintiff: \_\_\_\_\_  
Address of the second plaintiff: \_\_\_\_\_  
\_\_\_\_\_

Status of Plaintiff: CONVICTED ( ) PRETRIAL DETAINEE ( )

Revised 11/2014

2. Name of second defendant:

Davidson County Sheriff's Office

I.B.2.

Name	Employment	Address
Cpl. Eric Yevin	DCSO	N/A
Chief Joseph/Chief of Security	DCSO	N/A
Cpl. Kyvari Bolden	DCSO	N/A
Sgt. R. Goodale	DCSO	N/A
Lt. Lane	DCSO	N/A
Jail Administration/Chief A. Boldie	DCSO	N/A
Sgt. Bryant	DCSO	N/A
Sgt. Thomas	DCSO	N/A

*(Include the name of the institution and mailing address with zip code for each plaintiff. If any plaintiff changes his or her address, he or she must notify the Court immediately. If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.)*

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Mimi Lawrence  
 Place of employment of the first defendant: Wellpath  
 First defendant's address: N/A

Named in official capacity? ☒ Yes ☐ No  
 Named in individual capacity? ☐ Yes ☒ No

2. Name of the second defendant: Austin Boldie  
 Place of employment of the second defendant: Davidson County  
~~Davidson County~~ Sheriff's Office  
 Second defendant's address: N/A

Named in official capacity? ☒ Yes ☐ No  
 Named in individual capacity? ☐ Yes ☒ No

*(If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, his or her place of employment, address, and the capacity in which you are suing that defendant. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide each defendant's proper name, place of employment, and address, the Clerk will be unable to serve that defendant should process issue.)*

II. JURISDICTION

- A. Jurisdiction is asserted pursuant to 42 U.S.C. § 1983 (applies to state prisoners).  
 Jurisdiction is also invoked pursuant to 28 U.S.C. § 1343(a)(3).

If you wish to assert jurisdiction under different or additional statutes, you may list them below:

**III. PREVIOUS LAWSUITS** (The following information must be provided by each plaintiff.)

- A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuit(s) in the United States District Court for the Middle District of Tennessee, or in any other federal or state court? Yes ☒ No ☐

B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs

## Defendants

2. In what court did you file the previous lawsuit? N/A

(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)

3. What was the case number of the previous lawsuit? N/A

4. What was the Judge's name to whom the case was assigned? N/A

5. What type of case was it (for example, habeas corpus or civil rights action)?

6. When did you file the previous lawsuit? (Provide the year, if you do not know the exact date.) N/A

7. What was the result of the previous lawsuit? For example, was the case dismissed or appealed, or is it still pending? NA

8. When was the previous lawsuit decided by the court? (Provide the year, if you do not know the exact date.) N/A

9. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit? Yes ☒ No

*(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)*

## IV. EXHAUSTION

A. Are the facts of your lawsuit related to your present confinement?

☒ Yes ☐ No

B. If you checked the box marked "No" in question III.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain. N/A

C. Do the facts of your lawsuit relate to your confinement in a Tennessee state prison?

☐ Yes ☒ No

*(If you checked the box marked "No," proceed to question IV.G. If you checked the box marked "Yes," proceed to question IV.D.)*

D. Have you presented these facts to the prison authorities through the state grievance procedure? ☐ Yes ☐ No

E. If you checked the box marked "Yes" in question III.D above:

1. What steps did you take? N/A

2. What was the response of prison authorities? N/A

F. If you checked the box marked "No" in question IV.D above, explain why not. N/A

G. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)? ☒ Yes ☐ No

H. If "Yes" to the question above, have you presented these facts to the authorities who operate the detention facility? ☒ Yes ☐ No

I. If you checked the box marked "Yes" in question III.H above:

1. What steps did you take? I wrote a grievance and I spoke to different staff about the issues I was having, and they never investigated the truth about the issues I was having.

2. What was the response of the authorities who run the detention facility? That they were going to look into it and said that staff spoke with them and told them they did nothing wrong but the cameras say otherwise.

J. If you checked the box marked "No" in question IV.H above, explain why not. \_\_\_\_\_

N/A

## V. CAUSE OF ACTION

Briefly explain which of your constitutional rights were violated:

Cruel and Unusual punishment - Eighth Amendment - right to be free from cruel and unusual punishment, Excessive force in violation of the Fourteenth Amendment ~~and~~ to the U.S. Constitution, "Excessive Force"

## VI. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 1/2 inch x 11 inch paper. Write on one side only, and leave a 1-inch margin on all 4 sides.

On 05/05/2022 at approx. 11:40pm Wellpath Nurse Mimi Lawrence was conducting med pass when she got done giving everybody there meds she came to me during my recreation time in the dayroom and asked did I want my meds and I stated yes when she was giving me my meds I asked can I see my meds cause Mental Health told me to refuse my Mental Health meds when they come because it messes me up when I take it so during our conversation of me telling her I was refusing my Mental Health med which is called "Lexapro" I seen she was distracted by inmates calling her name so she could watch them masturbate on her and she flit back with them so by me seeing whats going on by me watching eye contact with her and she not paying attention cause she constantly looking behind me at the inmates, she ended up taking out the wrong medication when I stated to her that she took out the wrong pill she stated "no she didn't she took out the right one" so she poured the medications in my cup of water cause I take several other different pills also but when she poured it in my cup it dissolved

so fast that I couldn't recognize which was which so I took all the meds she poured in my cup and like 20 minutes later when I was done with my recreation time in the dayroom I went in my cell and my head started hurting, my chest, my stomach I couldn't taste my food or swallow my food and I started shaking rapidly so I told my pod officer Cpl. Harris to call the nurse, Cpl. Harris contacted medical for me and requested I be seen. I was then evaluated by Wellpath Nurse James, and Nurse Anji. Wellpath Nurses then determined I needed to be taken to the ER to be further evaluated. At 0131, Sgt. Goodale called a med com out of DDC 4<sup>th</sup> floor Triage Room. Medic 9 arrived on property at 0143 and departed at 0158 with me (Antonius E. Carter), escorted by Cpl. Hamilton and Cpl. Bever, going to Tristar Centinneal Hospital. On 5/6/2022 I came back from the hospital and I had to be seen by medical to go back to my pod were my assign cell was, so I spoke with the nurse and told them I didn't feel comfortable with the nurse (Mimi Lawrence) given me my meds, and my family also, I spoke with several different officers and supervisors on different shifts and I wrote grievances because I know her personally we was in a dating relationship and it went bad cause she played with my heart and feelings and so I stole money from her and disappeared and never contacted her again this happened between 2017 and 2019 and now I see she works for Wellpath through DDC and I feel like she retaliating for me stealing from her and now she playing the innocent role to the staff thats around her and its effecting me cause they believing her and officers/staff lying for her and covering for her. On 5/20/2022 Wellpath Nurse Mimi Lawrence works in the pod again after the hospital incident, so before she got to my door a staff told her I was gone throw "feces"/shit on her but I didn't know this til she got to my door, so before she got to my door she felt uncomfortable by what the staff told her so she came to my door



mad and with an attitude and stated "what meds you want me to take out" I said none they should be all correct I said why you got a attitude for she stated "cause Wellpath Nurse James told me you was gone throw shit on me thats nasty"; I stated "I didn't say that, I said did you hear me say that"; so she gave the medicine cup to the pod officer Cpl. Yevin to give to me and he told me to get some water so I did so I came back to receive my meds in my cup so she tried to give my medication to the pod officer Cpl. Yevin to give to me and I told her she gotta give me my meds cause she the nurse and she stated "well you won't be getting your meds from me tonight" and walked off, so I told the pod officer Cpl. Yevin can he call for Wellpath Nurse James to give me my meds cause he said if I have any problems with Nurse Mimi Lawrence given me my meds have the pod officer call for him and thats what I did Cpl. Yevin denied my request and slammed the pileflap in my face without telling me to move while I still had my hand on the pileflap with the cup of water in my hand waiting to receive my meds so when he did that water got on my lap cause I was squatted down looking out the pileflap talking to the pod officer to see about getting another nurse so I can take my meds but he ended up shutting the pileflap water went in my cell and outside my cell the officer said it got on him and the nurse but I didn't see how it got on the nurse when she been walked away from my cell to another to give them there meds and if it got on Cpl. Yevin it wasn't my fault he slammed the pileflap knowing my hand was there with the cup in my hand with water in it and Cpl. Yevin wrote me up for Assault on Officer and Nurse and threatening and disrespect behavior. On 8/21/2022 at approx. 4:15am they woke me up and handcuffed me and placed me in another cell that was nasty and filthy and had dried urine and shit all over the floor were you can smell it they never cleaned the cell before they put me in there and they wouldn't let me clean it, Cpl. Yevin



and Cpl. Bolden threatening me and made me get on the nasty cell floor on my stomach by the toilet and took all my clothes, socks, jumpsuit, everything while constantly threatening to smash my face in the floor if I breathe wrong in front of Lt. Lane and Sgt. Goodale. On 5/21/2022 at approx 8:45pm to 10:00pm I was having chest pains and I needed to see Medical so due to them having me on property restrictions and pile flap restriction, I had to get on the floor 4 or 5 times a day on a nasty floor, but they came to my cell with a red camera and said I had to go to the Medical Triage Room about my chest pains so they put me in full restraints and walked me out my cell through the dayroom, out of the dayroom, down the hallway to the Medical Triage Room to see Wellpath Nurse Amber in a T-Shirt, one pair of boxers on, no shoes or socks, barefooted, the Dayroom haven't been cleaned up in a month or cells, and they had me walking and coming out my cell like that I wasn't being disruptive or anything to be done this way and Lt. Lane and Sgt. Goodale approved of this. On 5/22/2022 at approx 9:30am it was time for me to come out for my recreation time in the Dayroom so I had to lay down on my stomach and Sgt. Thomas asked me where was my jumpsuit and shoes I stated "Lt. Lane and Sgt. Goodale took them and she stated "they wrong for that and that's 2nd shift for you" and Sgt. Thomas also stated "they never supposed to took my jumpsuit if I'm not being disruptive to come out my cell which I wasn't cause everything is documented on there computer and camera and there is no reports since I changed cells, Sgt. Thomas got me a jumpsuit and I came out for my recreation time in the dayroom for like 15 minutes barefooted no socks or shoes before they got me some out of my property this is fully Discrimination, and this is all on camera. On 5/25/2022 its been 7 days since I been in the shower I had no towel, no soap, no shower shoes, no face rag, no boxers, no shower curtain or anything so Sgt. Bryant told Cpl. Owen to grab me something out my

property so I can get in the shower due to the length of me not being able to get in the shower and I ended up catching two rashes between my thigh area on both sides by my crotch area were it was bleeding and sweating all over my boxers on the inside and I had to walk and sleep with my boxers stained like that for several days until I spoke to Wellpath Nurse Chad and he told me its Jock Itch once I shown him and he told me I had to take a thoroughly shower and put the cream on there that he prescribed for me and Sgt. Bryant was the only one allowed me to take a shower, but once I took a shower he stated at Breakfast time he will pick up my dirty laundry and he will have me do inventory on it so it can go out to be washed like everyone else. On 5/26/2022 Cpl. Yevin and Cpl. Owen did a cell search and found a tablet thats not allowed in Restricted Housing Unit they didn't write him up or anything the Supervisor was notified and given the tablet Sgt. Bryant, it happened in cell 4D-L-6 they wouldn't give me his name. On 5/21/2022 Cpl. Yevin wrote me up for Contraband, Possession of having a tablet in my cell and it was given to me from an officer thats discrimination, but on 5/26/2022 it was time for laundry to go out between 7pm to 7am so I told Cpl. Yevin he was the pod officer that I need my laundry that was took to my property and I needed him to go get it so I can do inventory and send my laundry out he ignored me I asked him several times and got the same results so when Sgt. Bryant came in the pod so they can be there so the nurse can give me my meds, I told Sgt. Bryant about my laundry and he told Cpl. Yevin to go get my laundry so it can be sent out to laundry Cpl. Yevin never did go get it I asked him several times again so now it is breakfast time Sgt. Bryant comes in and I tell him I never got a chance to send my laundry out so he told Cpl. Yevin what happened to him getting my laundry like he asked he stated "he didn't know were it was" Sgt. Bryant stated "I told you to go

get it that it was in the Tower" so when Sgt. Bryant left Cpl. Yerin stated "he wasn't doing nothing for me" so I never got a chance to send my laundry out like everyone else and that's discrimination. ON 5/28/2022 at approx. 9:30pm Wellpath Nurse Mimi Lawrence was conducting med pass in the unit I was in on the 4<sup>th</sup> floor Delta pod. Everybody in the pod was calling her name and messing with her cause what she had the officers doing to me which is meddling and lying on me cause she don't want me to expose that I know her and that we use to date and she seeking revenge and the officers are covering for her, she stated "that I said I know her whole family and I'm going to throw shit on her" and stated "that everytime she works in the pod I complain about chest pains or other medical complaints in attempt to get at her," I only said on this date I had chest pains that she worked and every other times been with other nurses because of the Mental Health Medication I was taken it gives me chest pains/headaches/stomache aches/loss of appetite/etc, but the staff taking this overboard and exaggerating everything when I have no problem with her to the point were I gotta blurt comments out at her or speak to her period I just feel uncomfortable with her giving me my meds and she feels uncomfortable giving me my meds due to what a staff told her and I keep getting wrote up for something I'm not doing and its getting out of hand to were I don't know what to do I contacted my family and the staff about it and wrote grievances and I'm still getting treated unfairly. On 5/30/2022 at approx. 11:15pm to 11:45pm they told me to pack up I was going to another facility called MCC at Harding Place. On 5/31/2022 at approx. 8:45pm they brought me back to Davidson County Detention Center from MCC which I don't know why. All these actions that took place was cause of Wellpath Nurse Mimi Lawrence cause of the friendship she have with staff this is all discrimination wasn't anyone else treated this way.

VII. **RELIEF REQUESTED:** State exactly what you want the Court to order each defendant to do for you.

A settlement for \$100,000 each for the 1<sup>st</sup> Defendant and 2<sup>nd</sup> Defendant, and my Federal case be dismissed and state case.

I request a jury trial.

☒ Yes

☐ No

VIII. **CERTIFICATION**

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: Antonia Carter Date: 9/14/22  
Prison Id. No. ~~213516~~ # 213516

Address (Include the city, state and zip code.): Laurel County Corrections Facility 440 Hammock Rd, London, Ky 40744

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Prison Id. No. \_\_\_\_\_

Address (Include the city, state and zip code.): \_\_\_\_\_

**ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT,** and provide the information requested above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

**ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS,** if not paying the civil filing fee.

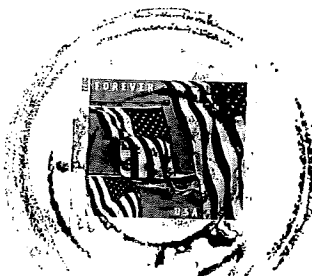
**SUBMIT THE COMPLAINT AND (1) THE REQUIRED FILING FEE OR (2) COMPLETED APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES AND COSTS TOGETHER.**

Complaints received without the required filing fee or application to proceed without prepayment of fees will be returned. Filing fees and applications to proceed without prepayment of fees submitted without a complaint will be returned.



#213516 Antonius Carter  
Laurel County Corrections Facility  
440 Hammock Rd.  
London, Ky 40744

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in Clerk's Office  
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